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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND
DIVISION

JANE ROE, an individual; MARY ROE,
an individual; SUSAN ROE, an
individual; JOHN ROE, an individual;
BARBARA ROE, an individual;
PHOENIX HOTEL SF, LLC, a
California limited liability company;
FUNKY FUN, LLC, a California limited
liability company; and 2930 EL
CAMINO, LLC, a California limited
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**DECLARATION OF BARBARA ROE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

**ASSIGNED FOR ALL PURPOSES
TO THE HONORABLE DISTRICT
JUDGE JON S. TIGAR,
COURTROOM 6**

Action Filed: 03/14/2024
Trial Date: Unassigned

1 I, Barbara Roe, declare as follows:

2 1. I am over the age of 18 and am one of the plaintiffs in the above-
3 captioned action. I am appearing in this action under the fictitious name of
4 "BARBARA ROE," in order to preserve my anonymity. I have personal knowledge of
5 the facts stated herein, except for facts that are stated on information, belief, or
6 understanding. As to the latter, I have a good faith basis for believing them to be
7 true. If called as a witness, I could and would competently testify thereto. I make this
8 declaration in support of Plaintiffs' Motion for Preliminary Injunction.

9 2. I have lived in the Tenderloin neighborhood of San Francisco since 2020.
10 I currently live on the corner of Leavenworth and McAllister. My home is located
11 approximately on the same block as the former site of the Tenderloin Linkage
12 Center, which was located at 1172 Market Street. Before the Tenderloin Linkage
13 Center closed in December 2022, the sidewalks right outside my building were
14 frequently crowded with homeless people who appeared to be using or selling illegal
15 drugs. The area around the Tenderloin Linkage Center was constantly suffering from
16 drug use, sales and dangerous criminal activity. After the closure of the Tenderloin
17 Linkage Center, these activities sometimes increased and sometimes decreased.

18 3. Recently, crowds of homeless and apparent drug dealers have been
19 regularly loitering outside the Proper Hotel across the street from my building. I see
20 many vendors trying to sell me something, which, at times, I think are illegal
21 narcotics. Occasionally, I see someone in these crowds with a knife, bat, or chain.
22 Many of these people appear to be illegal drug users. I know this because I can see
23 them injecting drugs, smoking, and acting extremely intoxicated. There is also
24 widespread activity that appears to be illegal drug sales. When I try to walk down
25 the sidewalk, I frequently have to step into the street to go around this group of
26 people, debris, and drug paraphernalia that are blocking the sidewalks near my
27 home.

28 4. I used to frequent a Whole Foods at 1185 Market Street that has since

1 closed. My understanding is that it was closed in response to concerns for the safety
2 of the employees because of similar conditions I experience around my home.

3 5. Another problem on the sidewalks outside my home is the presence of
4 discarded drug paraphernalia and human excrement on the sidewalks. I regularly
5 encounter paraphernalia and other biohazardous substances like urine and feces on
6 the sidewalk in front of my residence. Because of these conditions on my block and
7 the adjoining sidewalks, I must take extra care for my safety when entering or
8 leaving my home. Particularly at night, I must carry a taser with me to feel
9 comfortable leaving and returning to my home.

10 6. In approximately March 2024, a fence was erected around our home by
11 the Home Owners Association for my building. I was personally leading the effort to
12 erect this fence in direct response to the fears for safety expressed by residents of the
13 building. The door to our building was frequently blocked by crowds of seemingly
14 intoxicated and dangerous individuals, and residents, including myself, had to
15 navigate these crowds to enter or leave the building. Illegal fires were set outside our
16 building and the smoke would frequently set off the fire alarms. After the fence was
17 erected, homeless individuals still at times crowd right outside of the fence, appear to
18 be intoxicated, and buy or sell narcotics.

19 7. While these conditions and hazards outside my home will improve at
20 times, they have been largely consistent and have had a substantial impact on my
21 ability to enjoy the use of my home. I continue to take extra care for my safety when I
22 leave my building and walk on the sidewalks in the Tenderloin.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct to the best of my knowledge.

25 Executed on this 21th day of August, 2025, at San Francisco, California.

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Barbara Roe